

IN THE UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

APR 21 2025

Nathan Ochsner, Clerk of Court

**DAYANA ALEXANDER,**  
*Plaintiff,*

**CAUSE NO.: 4:25-cv-01614**

Vs.  
**CREDIT CONTROL SERVICES, INC.,**  
*doing business as*  
Credit Collection Services, Inc.  
*Defendant.*

**AFFIDAVIT OF DAYANA ALEXANDER**

**STATE OF TEXAS**

**COUNTY OF HARRIS**

I, Dayana Alexander, does solemnly affirm and declare under penalty of perjury the following:

**1. 1. Personal Information**

- a. My name is Dayana Alexander, and my mailing address is PO Box 114, Hockley, TX 77447.
- b. I am submitting this affidavit in support of my complaint against Credit Control Services, Inc. (CCS) for their negligent and willful non-compliance with the Fair Credit Reporting Act (FCRA) and the Fair Debt Collection Practices Act (FDCPA).

**2. Nature of Complaint**

- a. CCS has reported inaccurate debt information to credit reporting agencies, including TransUnion and Experian, regarding a balance of \$869 allegedly owed to Allstate Vehicle Property Insurance Company, dated November 30, 2022.

**CCS Reporting Alleged/Inaccurate Debt Information**

**experian.**

Prepared For DAYANA ALEXANDER Date generated: Jan 17, 2025

### Collection accounts

CREDIT CONTROL SERVICE			
Original creditor: ALLSTATE VEHICLE PROP IN. CO			
<input checked="" type="checkbox"/> Account info			
Account name	CREDIT CONTROL SERVICE	Balance	\$869
Account number	232770XX	Balance updated	Jan 14, 2025
Original creditor	ALLSTATE VEHICLE PROP IN. CO	Original balance	\$869
Company sold	-	Monthly payment	-
Account type	Collection	Past due amount	\$869
Date opened	Nov 30, 2022	Terms	-
Status	Collection account. \$869 past due as of Jan 2025.	Responsibility	Individual
Status updated	Nov 2022	Your statement	-

**TransUnion.**

Prepared For DAYANA ALEXANDER Date generated: Jan 17, 2025

### Collection accounts

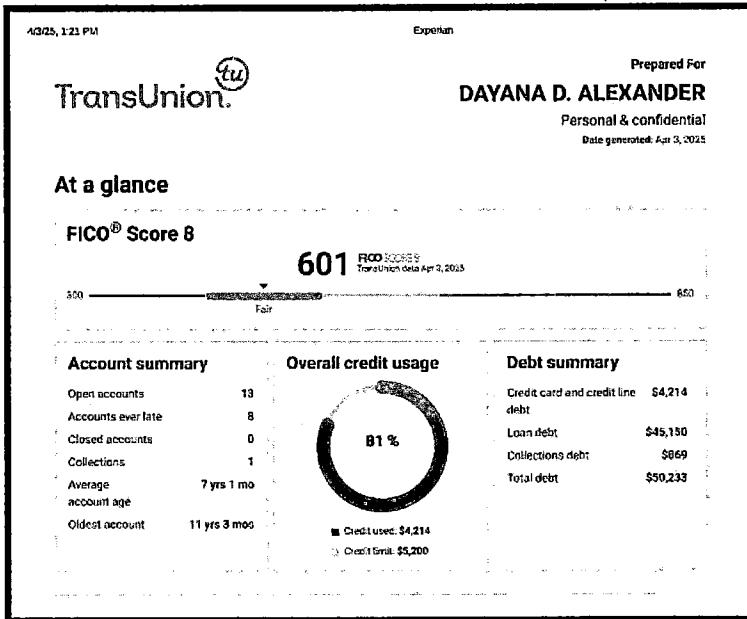
CREDIT COLL			
Original creditor: 06 ALLSTATE VEHICLE PROP IN CO			
Balance updated Jan 07, 2025			
<input checked="" type="checkbox"/> Account info			
Account name	CREDIT COLL	Balance	\$869
Account number	232770XX	Balance updated	Jan 07, 2025
Original creditor	06 ALLSTATE VEHICLE PROP IN CO	Paid off	0%
Company sold	-	Monthly payment	-
Account type	Open account	Past due amount	-
Date opened	Nov 30, 2022	Terms	-
Status	-	Responsibility	Individual account
Status updated	Jan 2025	Your statement	-

Despite my formal written dispute sent to Experian and TransUnion on or about **January 28, 2025 (EXHIBIT A- attached dispute letters Experience and TransUnion)**, CCS did not perform a reasonable investigation or validate the debt as required by the FCRA. Despite receiving dispute letters from the Plaintiff, requesting evidence of the reinvestigation and account-level documentation from the original creditor, CCS continued to report the account inaccurately and never provided the requested documentation. CCS's actions reflect both **negligence and willful disregard** for their legal obligations.

### **3. Evidence of Negligence and Non-Compliance**

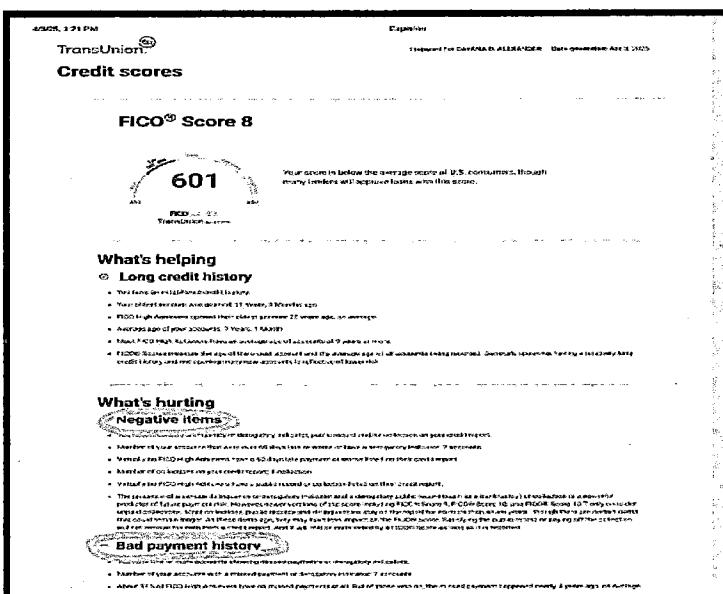
- a. The disputed debt is listed as a **collection account** on my credit reports with the status "**Account information disputed by consumer (Meets requirement of the Fair Credit Reporting Act)**". (**EXHIBIT B-Experian April 3 Report**), is insufficient as it does not correct the underlying inaccuracy and continues to negatively impact my creditworthiness.
- b. CCS failed to provide documentation to substantiate the debt and did not remove or correct the disputed account, violating their obligations under **15 U.S.C. § 1681s-2(b)**. CCS failed to conduct a reasonable investigation, review relevant information, or accurately report the results to the CRAs. Furthermore, my **requests for details regarding the reinvestigation process**, sent to Experian and TransUnion on March 14, 2025 (**EXHIBIT C -2nd dispute letters**), were not adequately addressed, indicating a continued failure to comply with FCRA requirements.
- c. Their willful non-compliance qualifies under **15 U.S.C. § 1681n**, which entitles affected consumers to **actual damages, punitive damages, and Litigation Costs**. The continued reporting of inaccurate information, despite my disputes and requests for validation, demonstrates a reckless disregard for my rights under the FCRA.

**Impact on Credit Profile and Financial Standing** My FICO® Score 8, as of April 3, 2025, is **601 (Fair)**, according to the TransUnion report (**EXHIBIT D-Transunion CR**)



significantly below the U.S. average. This low score is directly attributable to the derogatory reporting of the CCS account and other inaccuracies, as highlighted in the Experian credit report (**EXHIBIT E- Experian April 3**), which notes "Negative Items" and "Bad Payment History" as key factors hurting my score.

### EXHIBIT E



This inaccurate reporting caused me to lose credit opportunities, including a credit denial by **TAB Bank**, as documented in the **Notice of Adverse Action (EXHIBIT F-Adverse Action)** dated **February 4, 2025**.

### **EXHIBIT F-Adverse Notice Letter TAB Bank**

**NOTICE OF ADVERSE ACTION**

Date: 02/04/2025

Dayana Alexander  
15703 twisting springs dr  
cypress, TX 77433

Dear Applicant: Dayana Alexander

Thank you for applying for credit from TAB Bank\* through Sunbit.

After carefully reviewing your application, we are sorry to advise you that, at this time, TAB Bank cannot approve your application for credit. If you would like a statement of specific reasons why your application was denied by TAB Bank, please contact us using the information shown below within 60 days of the date of this letter. We will provide you with the statement of reasons within 30 days after receiving your request.

TAB Bank c/o Sunbit Now, LLC  
PO Box 24010  
Los Angeles, CA 90024  
Toll-Free Telephone No.: 855.678.6248

[X] TAB Bank's decision was based in whole or in part on information obtained in a report from the consumer reporting agency(ies) listed below. You have a right under the Fair Credit Reporting Act to know the information contained in your credit file at the consumer reporting agency(ies). The reporting agency(ies) played no part in TAB Bank's decision and is unable to supply specific reasons why TAB Bank did not approve your application. You also have a right to receive a free copy of your report from the reporting agency, if you request it no later than 60 days after you receive this notice. In addition, if you find that any information contained in the report(s) you receive is inaccurate or incomplete, you have the right to dispute the matter with the reporting agency(ies).

TransUnion LLC  
2 Baldwin Place  
P.O. Box 1000  
Chester, PA 19016  
Toll-Free Telephone No.: 800.888.4213

Notice: The Federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to enter into a binding contract); because all or part of the applicant's

The financial harm also includes the inability to proceed with necessary dental treatments outlined in the **Proposed Treatment Plan** from Waller Dental Associates, totaling **\$9,018**, as I could not secure adequate financing due to my lowered credit score.

### EXHIBIT G- Proposed Plan

<b>Proposed Treatment Plan</b>										2/4/2025
Waller Dental Associates, PA										
31315 FM 2920 RD, Suite 16A Waller, TX 77484-8022 (936)372-2673 (936)372-2673										
DAYANA Del Valle PO Box 114 Hockley, TX 77447										
10-28216										
Phase	Date Plan	Appt	Provider	Service	Th	Surf	Est	Inz	Pai	
1	2/4/2025		DC9	D0160 COMPREHENSIVE ORAL EVALUA			\$140.00	\$0.00	\$140.00	<i>HQ9</i>
1	2/4/2025		DC9	D1110 PROPHYLAXIS-ADULT			\$150.00	\$0.00	\$150.00	
1	2/4/2025		DC9	D0330 PANORAMIC FILM			\$124.00	\$0.00	\$124.00	
1	2/4/2025		DC9	D0210 INTRAL-CRITAL-COMPLETE (INCL. B)			\$201.00	\$0.00	\$201.00	
Subtotal for This Phase:										<del>\$615.00</del>
2	2/4/2025		DC9	D2550 CORE BUILDUP, INCLUDING ANY	2		\$387.00	\$0.00	\$387.00	<i>#100</i>
2	2/4/2025		DC9	D2650 CORE BUILDUP, INCLUDING ANY	3		\$387.00	\$0.00	\$387.00	
2	2/4/2025		DC9	D2650 CORE BUILDUP, INCLUDING ANY	4		\$387.00	\$0.00	\$387.00	
2	2/4/2025		DC9	D2740 CROWN-PORCELA/NCERAMIC S	2		\$1,700.00	\$0.00	\$1,700.00	
2	2/4/2025		DC9	D2740 CROWN-PORCELA/NCERAMIC S	3		\$1,700.00	\$0.00	\$1,700.00	
2	2/4/2025		DC9	D2740 CROWN-PORCELA/NCERAMIC S	4		\$1,700.00	\$0.00	\$1,700.00	
2	2/4/2025		DC9	DELCO DELIVER CROWN	2-4		\$0.00	\$0.00	\$0.00	
Subtotal for This Phase:										<del>\$6,261.00</del>
3	2/4/2025		DC9	D7210 SURGICAL REMOVAL OF ERUPT	16		\$444.00	\$0.00	\$444.00	<i>#375</i>
3	2/4/2025		DC9	D2332 RESIN-BASED COMPOSITE-TWO	16 OL		\$339.00	\$0.00	\$339.00	<i>#200</i>
3	2/4/2025		DC9	D2332 RESIN-BASED COMPOSITE-TWO	14 MO		\$339.00	\$0.00	\$339.00	<i>#300</i>
3	2/4/2025		DC9	D2333 RESIN-BASED COMPOSITE-THR	13 MOD		\$409.00	\$0.00	\$409.00	<i>#350</i>
Subtotal for This Phase:										<del>\$1,931.00</del>
4	2/4/2025		DC9	D2331 RESIN-BASED COMPOSITE-ONE	18 O		\$272.00	\$0.00	\$272.00	<i>#125</i>
4	2/4/2025		DC9	D2332 RESIN-BASED COMPOSITE-TWO	19 OB		\$339.00	\$0.00	\$339.00	<i>#200</i>
Subtotal for This Phase:										<del>\$611.00</del>
Subtotal:										<del>\$9,018.00</del>
LOS PRECIOS SE ME HAN EXPLICADO, YO NO AUTORIZO NINGUN TRATAMIENTO SOLO QUE YO FIRME EL CONSENTIMIENTO. PAGO DE ASEGURANZA NO ES GARANTIZADO. YO SOY RESPONSABLE POR LA DIFERENCIA.										
Total Proposed:										\$9,018.00
Total Completed:										\$0.00
Total Accepted:										\$0.00
Proposed Insurance:										\$0.00

#### 4. Emotional Distress and Reputational Harm

- a. CCS's failure to address and rectify the disputed debt has caused significant emotional distress, including anxiety and frustration over financial instability. The stress of dealing with inaccurate credit reporting has also impacted my ability to focus on my business, Agape Advocacy Consulting, as evidenced by the need to spend considerable time and resources attempting to correct these errors
- b. The inaccurate reporting has damaged my reputation with lenders, portraying an unjustified image of financial irresponsibility. This has made it difficult to secure favorable terms on loans and credit cards, further hindering my financial stability.
- c. **Abusive Divorce and Domestic Abuse:** I am currently enduring an abusive divorce and I am a victim of domestic abuse. This abuse has included emotional and financial coercion, exacerbating the strain on me and my children. This abusive environment has made restructuring my life extraordinarily challenging during this horrendous and trying time.
- d. **Impact of CCS's Inaccurate Credit Reporting:** During these emotional times, I have been diligently working to restructure my life by obtaining a car, housing, and medical care to provide stability for myself and my children. However, CCS's inaccurate reporting of an \$869 debt allegedly owed to Allstate Vehicle Property Insurance Company has led to repeated denials of credit, severely restraining my life and liberty. Specifically, I was denied a car loan, critical for transportation to court hearings and my advocacy work with Agape Advocacy Consulting. Similarly, housing applications were rejected, preventing me from securing a safe home for my children amidst the divorce's turmoil. These denials have trapped me in a cycle of instability, exacerbating the emotional toll of domestic abuse.
- e. **Denial of Medical Care:** CCS's inaccurate reporting has also blocked my access to medical care, further infringing on my liberty. I was denied Sunbit financing for essential dental treatments totaling \$11,347 (**EXHIBIT F**) Waller Dental Associates Proposed Treatment Plan (**EXHIBIT G**) and denied CareCredit for

eye treatments necessary for my health and ability to function as a parent and advocate (**EXHIBIT H- Care Credit Denial**). These denials, documented, have left me unable to address critical health needs, compounding the stress of the abusive divorce and court injustices. The inability to obtain medical care has significantly impacted my quality of life and ability to care for children.

- f. **Significant Life and Liberty Restraints:** The combined effect of CCS's inaccurate credit reporting and the court's injustices has significantly restrained my life and liberty. The denials for a car, housing, and medical care have prevented me from rebuilding a stable environment for my children, who are suffering emotionally. These restraints have hindered my pursuit of financial independence and safety, critical for escaping the cycle of domestic abuse. CCS's failure to correct the disputed debt, despite my formal disputes on January 28, 2025, demonstrates willful non-compliance under 15 U.S.C. § 1681n, entitling me to compensatory and punitive damages to address this injustice.
- g. **Emotional and Reputational Harm:** The ongoing injustices in my divorce case, coupled with CCS's inaccurate reporting, have caused profound emotional distress, including anxiety, fear, and despair, as I struggle to protect my children and rebuild my life. CCS's derogatory reporting has damaged my reputation with lenders, portraying me as financially irresponsible despite my efforts to dispute the debt. This has further isolated me, undermining my advocacy work and ability to provide for my children, whose well-being is my priority.

## 5. Punitive Damages

- a. Given CCS's **willful non-compliance** under 15 U.S.C. § 1681n, I seek punitive damages to deter similar conduct in the future. The statute allows for punitive damages to be awarded in cases of willful non-compliance with the FCRA.
- b. I respectfully request the Court impose **punitive damages in the amount of \$102,123** ( $9 \times \$11,347$ ), alongside the compensatory damages, to hold CCS accountable for their deliberate misconduct. This amount is justified given the severity of their negligence, the continued failure to validate the debt, and the

significant impact on my financial well-being.

#### 6. Legal Relief Requested

a. I respectfully request that the Court find CCS in violation of the **FCRA** and **FDCPA**, and order the following relief:

- Immediate removal or correction of the inaccurate debt information from my credit reports.
- Monetary compensation for emotional distress, financial harm, and reputational damage in the amount of **\$9,018**.
- **Punitive damages of \$81,162** for willful non-compliance, as permitted under **15 U.S.C. § 1681n**.
- Litigation costs associated with this complaint.

#### Affirmation

I affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Dayana Alexander

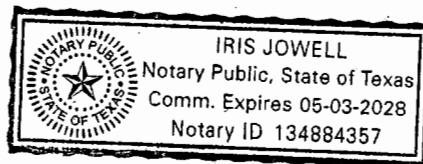
*Dayana Alexander*

Notary Public:

Subscribed and sworn to before me on this 21 day of April 2025, by **Dayana Alexander**.

EXECUTED this 21 day of April, 2025, in Houston County, Texas.

*[Signature]*



# EXHIBIT A

## **TransUnion**

Dayana Alexander  
PO BOX 114 Hockley, TX 77447

**TO.: TransUnion**

P.O. Box 2000  
Chester, PA 19016

**Subject:** Dispute of Inaccurate and Incomplete Information in Credit Report

Dear TransUnion,

I am writing to formally dispute the accuracy and completeness of several items on my credit report, as provided to me on **January 17, 2025**. Under the **Fair Credit Reporting Act (FCRA)**, I am entitled to an accurate and fair credit report. After carefully reviewing my report, I have identified multiple accounts with discrepancies, incomplete information, and unverifiable data. I request a thorough investigation of the following items:

---

### **Accounts with Discrepancies**

1. **WFBNA AUTO (Account #519120XXXX):**
  - **Issue:** The last payment date is listed as **October 4, 2022**, but the payment history is incomplete and inconsistent. The balance of **\$26,564** and charge-off status cannot be verified.
2. **AFFIRM INC (Account #T07YWSXX):**
  - **Issue:** The last payment date is listed as **May 22, 2022**, but the payment history shows "CO" (Charge Off) inconsistently. The balance of **\$622** is inaccurate and unverifiable.
3. **AFFIRM INC (Account #S6895FXX):**
  - **Issue:** The last payment date is listed as **June 15, 2022**, but the payment history is incomplete and inconsistent. The balance of **\$94** is inaccurate and unverifiable.
4. **CAPITAL ONE AUTO FINANCE (Account #620101XXXX):**
  - **Issue:** The last payment date is listed as **September 22, 2022**, but the payment history does not align with the reported charge-off balance of **\$37,658**.
5. **KOHLS/CAPONE (Account #639305XXXX):**
  - **Issue:** The last payment date is listed as **July 10, 2022**, but the payment history is incomplete and inconsistent. The balance of **\$2,592** is inaccurate and unverifiable.

**6. CREDIT CONTROL SERVICE (Collection Account):**

- **Issue:** The collection account balance of \$869 is unverifiable, and no payment history or supporting details are provided.

**7. DEPT OF ED/AIDVANTAGE (Multiple Accounts):**

- **Issue:** Payment histories are incomplete or marked as "ND" (No Data) for several years, making it impossible to verify the balances or statuses.

**8. NAVY FEDERAL CREDIT UNION (Account #XXXX):**

- **Issue:** The last payment date is listed as December 17, 2024, but the payment history is incomplete. The balance of \$4,355 and the high credit usage (83%) need verification.

---

**Request for Investigation**

I request that you investigate these items and provide me with documentation to verify their accuracy. Specifically:

- Validate the balances, last payment dates, and payment histories for all accounts.
- Remove or correct any information that cannot be verified or is found to be inaccurate or incomplete.

If you cannot verify the accuracy of these accounts, I ask that you remove them from my credit report as required by the FCRA.

**Supporting Documentation**

I have attached a copy of my credit report with the disputed items highlighted for your reference. Please include the results of your investigation in writing and provide me with an updated copy of my credit report once the investigation is complete.

Thank you for your prompt attention to this matter. I look forward to your response within the 30-day timeframe required by law.

Sincerely,

Date: 1/28/25

**Dayana Alexander**

[dayanaalexander@yahoo.com](mailto:dayanaalexander@yahoo.com)

## **Experian**

Dayana Alexander  
PO BOX 114 Hockley, TX 77447

**TO.: Experian**  
P.O. Box 4500  
Allen, TX 75013

**Subject:** Dispute of Inaccurate and Incomplete Information in Credit Report

Dear Experian,

I am writing to formally dispute the accuracy and completeness of several items on my credit report, as provided to me on **January 17, 2025**. Under the **Fair Credit Reporting Act (FCRA)**, I am entitled to an accurate and fair credit report. After carefully reviewing my report, I have identified multiple accounts with discrepancies, incomplete information, and unverifiable data. I request a thorough investigation of the following items:

---

### **Accounts with Discrepancies**

1. **WFBNA AUTO (Account #519120XXXX):**
  - **Issue:** The last payment date is listed as **October 4, 2022**, but the payment history is incomplete and inconsistent. The balance of **\$26,564** and charge-off status cannot be verified.
2. **AFFIRM INC (Account #T07YWSXX):**
  - **Issue:** The last payment date is listed as **May 22, 2022**, but the payment history shows "CO" (Charge Off) inconsistently. The balance of **\$622** is inaccurate and unverifiable.
3. **AFFIRM INC (Account #S6895FXX):**
  - **Issue:** The last payment date is listed as **June 15, 2022**, but the payment history is incomplete and inconsistent. The balance of **\$94** is inaccurate and unverifiable.
4. **CAPITAL ONE AUTO FINANCE (Account #620101XXXX):**
  - **Issue:** The last payment date is listed as **September 22, 2022**, but the payment history does not align with the reported charge-off balance of **\$37,658**.
5. **KOHLS/CAPONE (Account #639305XXXX):**
  - **Issue:** The last payment date is listed as **July 10, 2022**, but the payment history is incomplete and inconsistent. The balance of **\$2,592** is inaccurate and unverifiable.
6. **CREDIT CONTROL SERVICE (Collection Account):**

- **Issue:** The collection account balance of **\$869** is unverifiable, and no payment history or supporting details are provided.

**7. DEPT OF ED/AIDVANTAGE (Multiple Accounts):**

- **Issue:** Payment histories are incomplete or marked as "ND" (No Data) for several years, making it impossible to verify the balances or statuses.

**8. NAVY FEDERAL CREDIT UNION (Account #XXXX):**

- **Issue:** The last payment date is listed as **December 17, 2024**, but the payment history is incomplete. The balance of **\$4,355** and the high credit usage (83%) need verification.

---

### **Request for Investigation**

I request that you investigate these items and provide me with documentation to verify their accuracy. Specifically:

- Validate the balances, last payment dates, and payment histories for all accounts.
- Remove or correct any information that cannot be verified or is found to be inaccurate or incomplete.

If you cannot verify the accuracy of these accounts, I ask that you remove them from my credit report as required by the FCRA.

### **Supporting Documentation**

I have attached a copy of my credit report with the disputed items highlighted for your reference. Please include the results of your investigation in writing and provide me with an updated copy of my credit report once the investigation is complete.

Thank you for your prompt attention to this matter. I look forward to your response within the 30-day timeframe required by law.

Sincerely,

Date: **1/28/25**

**Dayana Alexander**

[dayanaalexander@yahoo.com](mailto:dayanaalexander@yahoo.com)

# EXHIBIT B



## Collection accounts

<b>CREDIT CONTROL SERVICE</b> \$869																																																															
Original creditor: ALLSTATE VEHICLE PROP IN CO																																																															
<b>Account info</b>																																																															
Account name CREDIT CONTROL SERVICE Balance \$869																																																															
Account number 232770XX Balance updated Mar 27, 2025																																																															
Original creditor ALLSTATE VEHICLE PROP IN CO Original balance \$869																																																															
Company sold - Monthly payment -																																																															
Account type Collection Past due amount \$869																																																															
Date opened Nov 30, 2022 Terms -																																																															
Status Collection account. \$869 past due as of Mar 2025. Responsibility Individual																																																															
Status updated Nov 2022 Your statement -																																																															
<b>Payment history</b>																																																															
<table> <thead> <tr> <th></th><th>Jan</th><th>Feb</th><th>Mar</th><th>Apr</th><th>May</th><th>Jun</th><th>Jul</th><th>Aug</th><th>Sep</th><th>Oct</th><th>Nov</th><th>Dec</th></tr> </thead> <tbody> <tr> <td>2025</td><td>C</td><td>C</td><td>C</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr> <td>2024</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td></tr> <tr> <td>2023</td><td>-</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td></tr> </tbody> </table>													Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2025	C	C	C	-	-	-	-	-	-	-	-	-	2024	C	C	C	C	C	C	C	C	C	C	C	C	2023	-	C	C	C	C	C	C	C	C	C	C	C
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2024	C	C	C	C	C	C	C	C	C	C	C	C																																																			
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C Collection - Data Unavailable																																																															
<b>Contact info</b>																																																															
Address 725 CANTON ST NORWOOD, MA 02062																																																															
Phone number (617) 965-2000																																																															
<b>Comments</b>																																																															
Account information disputed by consumer (Meets requirement of the Fair Credit Reporting Act)																																																															

# EXHIBIT C

**EXHIBIT C**

**TransUnion**

Dayana Alexander  
PO BOX 114 Hockley, TX 77447

**TO.: TransUnion**

P.O. Box 2000  
Chester, PA 19016

**Subject: Request for Details Regarding Reinvestigation Process**

Date: Mar 14, 2025

Dear TransUnion,

I am writing to formally request detailed information regarding the reinvestigation process you conducted in response to my recent dispute of inaccurate and incomplete information on my credit report. Under the Fair Credit Reporting Act (FCRA), I am entitled to a thorough and reasonable reinvestigation of disputed items, as well as transparency regarding how the reinvestigation was conducted.

Specifically, I am requesting the following details for each disputed account:

1. KOHLS/CAPONE (Account #639305XXXX):
  - How was the charge-off balance of \$2,592 verified?
  - What steps were taken to confirm the accuracy of the payment history, which remains incomplete and inconsistent?
  - Was the furnisher contacted, and if so, what documentation was provided to verify the information?
2. WELLS FARGO AUTO (Account #519120XXXX):
  - How was the charge-off balance of \$26,564 verified?
  - What evidence was used to confirm the repossession details and payment history?
  - Was the furnisher contacted, and what specific information did they provide to verify the account?
3. CREDIT CONTROL SERVICE (Collection Account):
  - How was the collection account balance of \$869 verified?
  - What documentation was provided by the furnisher to validate the debt?
  - Were any additional steps taken to confirm the accuracy of the account details?
4. CAPITAL ONE AUTO FINANCE (Account #620101XXXX):
  - How was the charge-off balance of \$38,141 verified?

- What steps were taken to confirm the accuracy of the payment history and the past-due amount?
- Was the furnisher contacted, and what documentation did they provide to support their response?

5. DEPT OF ED/AIDVANTAGE (Multiple Accounts):

- How were the incomplete payment histories marked as "No Data" (ND) verified?
- What steps were taken to confirm the balances and statuses of these accounts?
- Was the furnisher contacted, and what evidence did they provide to verify the information?

In addition to the above, I request that you provide:

- A detailed explanation of the reinvestigation process, including whether all relevant information I provided was forwarded to the furnishers.
- Copies of any documentation or evidence used to verify the accuracy of the disputed items.
- The names and contact information of the furnishers or entities that were contacted during the reinvestigation.
- A clear explanation of how the results of the reinvestigation were determined.

If you cannot provide this information or if the disputed items cannot be verified, I request that you remove or correct the inaccurate or incomplete information as required by the FCRA.

Please provide me with a written response detailing the results of your reinvestigation and the requested information within the 30-day timeframe required by law.

Thank you for your attention to this matter. I look forward to your prompt response.

Sincerely,

Dayana Alexander  
dayanaalexander@yahoo.com

**EXHIBIT C**

**EXPERIAN**

**Dayana Alexander**  
PO BOX 114  
Hockley, TX 77447

**TO:** Experian  
P.O. Box 4500  
Allen, TX 75013

**Subject:** Request for Details Regarding Reinvestigation Process

**Date:** Mar 14, 2025

Dear Experian,

I am writing to formally request detailed information regarding the reinvestigation process you conducted in response to my recent dispute of inaccurate and incomplete information on my credit report. Under the Fair Credit Reporting Act (FCRA), I am entitled to a thorough and reasonable reinvestigation of disputed items, as well as transparency regarding how the reinvestigation was conducted.

Specifically, I am requesting the following details for each disputed account:

1. **WFBNA AUTO (Account #519120XXXX):**
  - What steps were taken to verify the accuracy of the balance of \$26,564 and the charge-off status?
  - Was the furnisher contacted, and if so, what documentation was provided to verify the information?
2. **AFFIRM INC (Account #T07YWSXX):**
  - How was the charge-off balance of \$622 verified?
  - Was the payment history reviewed for completeness and accuracy?
3. **AFFIRM INC (Account #S6895FXX):**
  - What evidence was used to confirm the balance of \$94 and the payment history?
4. **CAPITAL ONE AUTO FINANCE (Account #620101XXXX):**
  - How was the charge-off balance of \$37,658 verified?
  - Was the payment history reviewed for accuracy?
5. **KOHLS/CAPONE (Account #639305XXXX):**
  - What steps were taken to verify the balance of \$2,592 and the payment history?
6. **CREDIT CONTROL SERVICE (Collection Account):**

- What documentation was provided to validate the collection account balance of \$869?

**7. DEPT OF ED/AIDVANTAGE (Multiple Accounts):**

- How were the incomplete payment histories marked as "ND" (No Data) verified?
- What steps were taken to confirm the balances and statuses of these accounts?

**8. NAVY FEDERAL CREDIT UNION (Account #XXXX):**

- How was the balance of \$4,355 and the high credit usage (83%) verified?

In addition to the above, I request that you provide:

- A detailed explanation of the reinvestigation process, including whether all relevant information I provided was forwarded to the furnishers.
- Copies of any documentation or evidence used to verify the accuracy of the disputed items.
- The names and contact information of the furnishers or entities that were contacted during the reinvestigation.
- A clear explanation of how the results of the reinvestigation were determined.

If you cannot provide this information or if the disputed items cannot be verified, I request that you remove or correct the inaccurate or incomplete information as required by the FCRA.

Please provide me with a written response detailing the results of your reinvestigation and the requested information within the 30-day timeframe required by law.

Thank you for your attention to this matter. I look forward to your prompt response.

Sincerely,

**Dayana Alexander**

dayanaalexander@yahoo.com

# EXHIBIT D



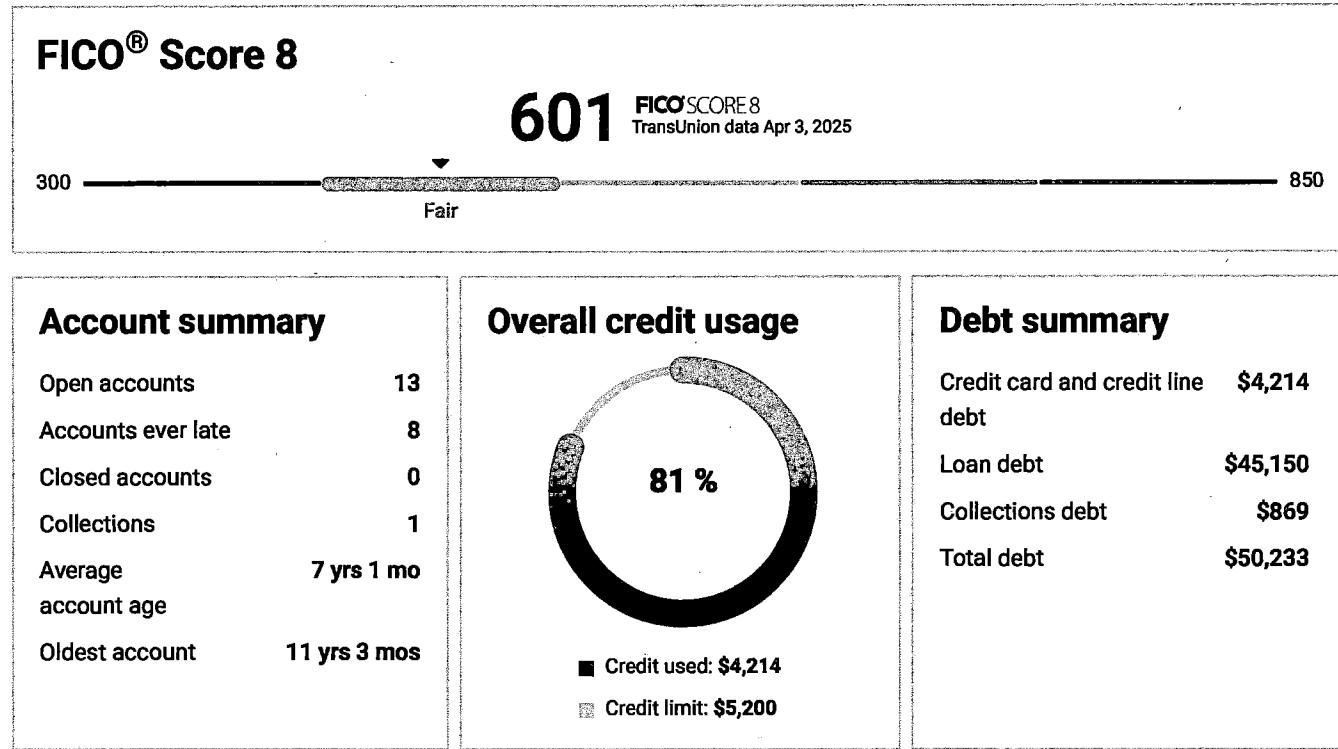
## EXHIBIT D

Prepared For

**DAYANA D. ALEXANDER**

Personal &amp; confidential

Date generated: Apr 3, 2025

**At a glance**

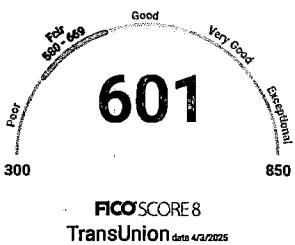
# EXHIBIT E



## Credit scores

### EXHIBIT E

#### FICO® Score 8



Your score is below the average score of U.S. consumers, though many lenders will approve loans with this score.

#### What's helping

##### ① Long credit history

- You have an established credit history.
- Your oldest account was opened: 11 Years, 3 Months ago
- FICO High Achievers opened their oldest account 25 years ago, on average.
- Average age of your accounts: 7 Years, 1 Month
- Most FICO High Achievers have an average age of accounts of 9 years or more.
- FICO® Scores measure the age of the oldest account and the average age of all accounts being reported. Generally speaking, having a relatively long credit history and not opening many new accounts is reflective of lower risk.

#### What's hurting

##### – Negative items

- You have a serious delinquency or derogatory indicator, public record and/or collection on your credit report.
- Number of your accounts that were ever 60 days late or worse or have a derogatory indicator: 7 accounts
- Virtually no FICO High Achievers have a 60 days late payment or worse listed on their credit report.
- Number of collections on your credit report: 1 collection
- Virtually no FICO High Achievers have a public record or collection listed on their credit report.
- The presence of a serious delinquency or derogatory indicator and a derogatory public record (such as a bankruptcy) or collection is a powerful predictor of future payment risk. However, newer versions of the score including FICO® Score 9, FICO® Score 10, and FICO® Score 10 T only consider unpaid collections. Most collections, public records and delinquencies stay on the report for no more than seven years - though there are certain items that could remain longer. As these items age, they may have less impact on the FICO® Score. Satisfying the public record or paying off the collection will not remove the item from a credit report. And it will still be considered by a FICO® Score as long as it is reported.

##### – Bad payment history

- You have one or more accounts showing missed payments or derogatory indicators.
- Number of your accounts with a missed payment or derogatory indicator: 7 accounts
- About 98% of FICO High Achievers have no missed payments at all. But of those who do, the missed payment happened nearly 4 years ago, on average.

# EXHIBIT F



Gmail

EXHIBIT F

Dayana Alexander &lt;info@agapeconsultations.com&gt;

**Your purchase was declined (Purchase No. 82-950-949)**

**Sunbit** <automated@sunbit.com>  
Reply-To: <no-reply@sunbit.com>  
To: <info@agapeconsultations.com>

Tue, Feb 4 at 2:28 PM

**NOTICE OF ADVERSE ACTION**

Date: 02/04/2025

Dayana Alexander  
15703 twisting springs dr  
cypress, TX 77433

Dear Applicant: Dayana Alexander

Thank you for applying for credit from TAB Bank\* through Sunbit.

After carefully reviewing your application, we are sorry to advise you that, at this time, TAB Bank cannot approve your application for credit. If you would like a statement of specific reasons why your application was denied by TAB Bank, please contact us using the information shown below within 60 days of the date of this letter. We will provide you with the statement of reasons within 30 days after receiving your request.

TAB Bank c/o Sunbit Now, LLC  
PO Box 24010  
Los Angeles, CA 90024  
Toll-Free Telephone No.: 855.678.6248

[X] TAB Bank's decision was based in whole or in part on information obtained in a report from the consumer reporting agency(ies) listed below. You have a right under the Fair Credit Reporting Act to know the information contained in your credit file at the consumer reporting agency(ies). The reporting agency(ies) played no part in TAB Bank's decision and is unable to supply specific reasons why TAB Bank did not approve your application. You also have a right to receive a free copy of your report from the reporting agency, if you request it no later than 60 days after you receive this notice. In addition, if you find that any information contained in the report(s) you receive is inaccurate or incomplete, you have the right to dispute the matter with the reporting agency(ies).

TransUnion LLC  
2 Baldwin Place  
P.O. Box 1000  
Chester, PA 19016  
Toll-Free Telephone No.: 800.888.4213

Notice: The Federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to enter into a binding contract); because all or part of the applicant's

income derives from any public assistance program because the applicant has in good faith exercised any right under the Consumer Credit Protection Act. The Federal agency that administers compliance with this law concerning this creditor is the Federal Deposit Insurance Corporation (FDIC), whose address is Division of Depositor and Consumer Protection, National Center for Consumer and Depositor Assistance, Federal Deposit Insurance Corporation, 1100 Walnut Street, Box #11, Kansas City, MO 64106.

**Sincerely,**  
**TAB Bank**

\*Transportation Alliance Bank, Inc., dba TAB Bank, 4185 Harrison Blvd., Ogden, UT 84403

# EXHIBIT G

# Proposed Treatment Plan

## Waller Dental Associates, PA

2/4/2025

31315 FM 2920 Rd. Suite 16A  
 Waller, TX 77484-8022  
 (936)372-2673 (936)372-2673

DAYANA Del Valle  
 PO Box 114  
 Hockley, TX 77447

ID: 28216

<u>Phase</u>	<u>Date</u>	<u>Plan</u>	<u>Appt</u>	<u>Provider</u>	<u>Service</u>	<u>Tth</u>	<u>Surf</u>	<u>Fee</u>	<u>Ins.</u>	<u>Pat.</u>
1	2/4/2025			D09	D0150 COMPREHENSIVE ORAL EVALUA			\$140.00	\$0.00	\$140.00
1	2/4/2025			D09	D1110 PROPHYLAXIS-ADULT			\$150.00	\$0.00	\$150.00
1	2/4/2025			D09	D0330 PANORAMIC FILM			\$124.00	\$0.00	\$124.00
1	2/4/2025			D09	D0210 INTRAORAL-COMPLETE (INCL. B)			\$201.00	\$0.00	\$201.00
<b>Subtotal for This Phase:</b>								<del>\$615.00</del>	<del>\$0.00</del>	<del>\$615.00</del>
2	2/4/2025			D09	D2950 CORE BUILDUP, INCLUDING ANY	2		\$387.00	\$0.00	\$387.00
2	2/4/2025			D09	D2950 CORE BUILDUP, INCLUDING ANY	3		\$387.00	\$0.00	\$387.00
2	2/4/2025			D09	D2950 CORE BUILDUP, INCLUDING ANY	4		\$387.00	\$0.00	\$387.00
2	2/4/2025			D09	D2740 CROWN-PORCELAIN/CERAMIC S	2		\$1,700.00	\$0.00	\$1,700.00
2	2/4/2025			D09	D2740 CROWN-PORCELAIN/CERAMIC S	3		\$1,700.00	\$0.00	\$1,700.00
2	2/4/2025			D09	D2740 CROWN-PORCELAIN/CERAMIC S	4		\$1,700.00	\$0.00	\$1,700.00
2	2/4/2025			DELC	DELIVER CROWN	2-4		\$0.00	\$0.00	\$0.00
<b>Subtotal for This Phase:</b>								<del>\$6,261.00</del>	<del>\$0.00</del>	<del>\$6,261.00</del>
3	2/4/2025			D09	D7210 SURGICAL REMOVAL OF ERUPT	16		\$444.00	\$0.00	\$444.00
3	2/4/2025			D09	D2392 RESIN-BASED COMPOSITE-TWO	15	OL	\$339.00	\$0.00	\$339.00
3	2/4/2025			D09	D2392 RESIN-BASED COMPOSITE-TWO	14	MO	\$339.00	\$0.00	\$339.00
3	2/4/2025			D09	D2393 RESIN-BASED COMPOSITE-THR	13	MOD	\$409.00	\$0.00	\$409.00
<b>Subtotal for This Phase:</b>								<del>\$1,531.00</del>	<del>\$0.00</del>	<del>\$1,531.00</del>
4	2/4/2025			D09	D2391 RESIN-BASED COMPOSITE-ONE	18	O	\$272.00	\$0.00	\$272.00
4	2/4/2025			D09	D2392 RESIN-BASED COMPOSITE-TWO	19	OB	\$339.00	\$0.00	\$339.00
<b>Subtotal for This Phase:</b>								<del>\$611.00</del>	<del>\$0.00</del>	<del>\$611.00</del>
<b>Subtotal:</b>								<del>\$9,018.00</del>	<del>\$0.00</del>	<del>\$9,018.00</del>

LOS PRECIOS SE ME HAN EXPLICADO, YO NO AUTORIZO NINGUN TRATAMIENTO SOLO QUE YO FIRME EL CONSENTIMIENTO. PAGO DE ASEGURANZA NO ES GARANTIZADO. YO SOY RESPONSABLE POR LA DIFERENCIA.

Total Proposed: \$9,018.00  
 Total Completed: \$0.00  
 Total Accepted: \$0.00  
 Proposed Insurance: \$0.00

# EXHIBIT H

## EXHIBIT H

**Stanton OPTICAL**

Find A Store | Enter City, State or Zip

**BOOK EYEEXAM**

Eye Health > Eyeglasses > Contact Lenses > Sunglasses > Order Status Insurance My Account >

Tomball    

**Your Cart** [Continue Shopping](#)

Welcome Dayana Alexander! Loyalty Club Member. [Use Loyalty Benefits](#)

[Contacts Club](#)

	Bal Harbour Christian of Paris	\$738.91	
<input checked="" type="checkbox"/> Frame Warranty		Included	
<input checked="" type="checkbox"/> Lens Warranty		\$25.00	
<a href="#">Prescription added: View Details</a>		Savings: \$275.97	
		Total: \$487.94	
<a href="#">Glasses come with case and microfiber cloth</a>			

[+ Duplicate Item](#) |  [Edit](#)  [Remove](#)

**Shipping**  
 Estimated delivery May 05

**Order Summary**

Subtotal:	\$3699.55
Shipping:	FREE
Promotions Applied:	(\$50.00)
Discount:	(\$1319.85)
Tax:	\$0.00
Total:	\$2329.70

**SECURE CHECKOUT**

Synchrony Bank  
P.O. Box 71758  
Philadelphia, PA 19176-1758

April 13, 2025

DAYANA ALEXANDER  
PO BOX 114  
HOCKLEY, TX 77447-0114

15912

M102

DDCNSUSE

VISCCJ1CDTT

Dear DAYANA ALEXANDER,

We have received your request for a credit product with CARECREDIT issued by Synchrony Bank. Unfortunately, we are unable to approve your request at this time.

Our decision was based in part on a credit scoring system that was used to evaluate your request. The most significant reason(s) where you did not score well are listed below:

- Lack of real estate secured loan information
- Balances on accounts too high compared to credit limits and loan amounts
- Too few accounts paid as agreed
- Not enough balance paid down over time on installment accounts

Some information used to make this decision was obtained from the consumer reporting agency (agencies) listed below. This consumer reporting agency (agencies) did not make this credit decision and is unable to provide you with the specific reason(s) for our action. If you believe there may be information on your credit bureau that is not correct, we suggest you contact the consumer reporting agency below to verify the information. If more than one agency is disclosed the reason(s) shown are based on the report provided by the first listed agency.

T.U. CONSUMER RELATIONS  
2 BALDWIN PLACE, PO BOX 1000  
CHESTER, PA 19016  
800-888-4213

Please see reverse side for important information

**TO WHOM THIS LETTER IS ADDRESSED**

Please direct any inquiries concerning this notice to the creditor whose name and address is located in the upper left hand corner of the reverse side.

Requests for a copy of your credit report should be sent to the credit reporting agency listed on the reverse side. If no agency is listed, a credit report was not utilized in making this decision.

The Federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to enter into a binding contract), because all or part of the applicant's income derives from any public assistance program or because the applicant has in good faith exercised any right under the Consumer Credit Protection Act.

Creditor: Synchrony Bank. The federal agency that administers compliance with this law concerning this creditor is the *Bureau of Consumer Financial Protection, 1700 G Street NW, Washington, DC 20552*.

Under the federal Fair Credit Reporting Act, if a consumer reporting agency or agencies is identified in this letter, you have the right (i) to obtain, within 60 days from your receipt of this letter, a free copy of a consumer report on you from the identified agency or agencies and (ii) to dispute the accuracy or completeness of any information on you in a consumer report furnished by the consumer reporting agency or agencies.

**OHIO RESIDENTS:** The Ohio laws against discrimination require that all creditors make credit equally available to all credit worthy customers and that credit reporting agencies maintain separate credit histories on each individual upon request. The Ohio Civil Rights Commission administers compliance with this law.

O 1AC 1141 - 01/25/2024

**Information about your Credit Score used in this evaluation for credit**

In addition, we also obtained an external credit score from the consumer reporting agency indicated above and used it in making our credit decision. If more than one agency is listed, the credit score was obtained from the first listed agency. Your credit score is a number that reflects the information in your credit report. Your credit score can change, depending on how the information in your credit report changes. The credit score below was developed using standard industry methods and was used to evaluate your application. The credit score may differ from the score you obtain from a consumer reporting agency.

Your Credit Score: 554

Date: 04/09/2025

Scores range from a low of 300 to a high of 850.

Key factors that adversely affected your credit score:

Lack of real estate secured loan information

Balances on accounts too high compared to credit limits and loan amounts

Too few accounts paid as agreed

Not enough balance paid down over time on installment accounts

Sincerely,

Synchrony Bank